

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., *et al.*,<sup>1</sup> ) Case No. 01-1139 (JKF)  
) Jointly Administered  
Debtors. )

Re: Docket Nos. 12823, 13004, 13130,  
12924, 12927, 12929, 12930, 12931, 12944,  
12932, 12933, 12934, 12935, 12936, 12937,  
12938, 12939, 12940, 12945, 12946, 12947,  
12960, 12963, 12970, 12974, 12980, 13067,  
13161, 13141, 13142, 13144, 13157, 13158,  
13160

**CERTIFICATION OF COUNSEL  
REGARDING ORDER CONCERNING SCHEDULE FOR MOTIONS TO COMPEL  
REGARDING THE W.R. GRACE ASBESTOS PERSONAL INJURY QUESTIONNAIRE  
AND SCHEDULE FOR SUPPLEMENTATION OF QUESTIONNAIRE RESPONSES**

1. The Debtors have conferred with the Official Committee of Asbestos Personal Injury Claimants ("PI Committee") and various law firms representing large numbers of claimants, which are represented by Stutzman, Bromberg, Esserman & Plifka, P.C. (the "Stutzman Firms") and Montgomery McCracken Walker & Rhoads LLP (the "MMWR Firms"),

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

and agreement has been reached among the Debtors, the Stutzman Firms, and the MMWR Firms<sup>2</sup> on a proposed form of Order Concerning Schedule for Motions to Compel Regarding the W.R. Grace Asbestos Personal Injury Questionnaire and Schedule For Supplementation of Questionnaire Responses (the "Order"); and

2. The PI Committee has no objection to the entry of the Order and has informed numerous but not all law firms representing Grace asbestos personal injury claimants of the schedule contained in this order and that it was not opposing entry of the Order;

3. Attached hereto as Exhibit A is a copy of the Order.

4. By way of this certification, the Debtors respectfully request that the Court enter the Proposed Order.

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<sup>2</sup> The MMWR Firms agreeing to abide by the terms of the order are: Wise & Julian, P.C.; Kazan, McLain, Abrams, Fernandez, Lyons, Farris & Greenwood, A Professional Law Corporation; Waters & Kraus LLP; Shingler & Simon, LLP; Paul, Hanley & Harley, LLP; Rose Klien & Marias, LLP; Early Ludwick & Sweeney; and Early & Strauss.

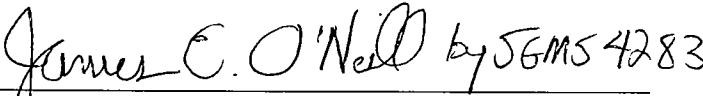
5. Counsel for the parties are available, should the Court have any questions or concerns with the foregoing or the Proposed Order.

Dated: November 2, 2006

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-and-

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